

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL SAVEONSP'S MOTION TO COMPEL JJHCS TO
PRODUCE DOCUMENTS FROM THE PAFA+ DATABASE (ECF NOS. 511, 526 & 554)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to Produce Documents From the PAFA+ Database, dated January 29, 2025 (ECF No. 511)</u>		JJHCS requests the redaction of information in and exhibits to the January 29, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information and/or confidential health information for patients. In addition, Exhibits 16-18 and 38 were produced by non-parties pursuant to subpoenas and designated as Confidential – Attorneys' Eyes Only	If filed on the public docket, these portions of the January 29, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information. It would also	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–4 & 9–15 and notes 3, 6 & 8	Redactions discussing confidential exhibits					
Exhibits 1, 13, 17, 18, 20, 24, 26, & 32	Sealing of confidential documents and presentations containing competitively sensitive information					

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Exhibits 2, 10, 12, 19 & 30	Redactions to discovery letters discussing confidential documents	or Attorneys' Eyes Only – Confidential Health Information.	improperly disclose patient health information.			
Exhibit 3	Sealing of confidential chat log discussing confidential information					
Exhibits 4, 6, 15, 21, 25, 27–29, 31, 33, 34, 41 & 42	Sealing of emails and attachments discussing confidential information					

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Exhibit 5	Redactions to discovery responses and objections containing references to confidential information					
Exhibit 7	Redactions to discovery requests containing references to confidential information					
Exhibits 14, 16, 17, 18, 22, 23, 37, & 38	Sealing of spreadsheets containing confidential information					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's Motion to Compel JJHCS to Produce Documents From PAFA+, dated February 12, 2025</u> (ECF No. 526)		JJHCS requests the redaction of information in and exhibits to the February 12, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the February 12, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 4 n.2 ("Business . . . plans") and 11 ("JJHCS . . . period")	Redactions discussing confidential exhibits					
Exhibits 2–5	Redactions to discovery letters discussing confidential documents					

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Exhibit 13	Redactions to interrogatory responses discussing confidential information					
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to SaveOnSP's Motion to Compel JJHCS to Produce Documents From the PAFA+ Database, dated February 24, 2025 (ECF No. 554)</u>		JJHCS requests the redaction of information in and exhibits to the February 24, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the February 24, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is	None	None
Pages 4 & 7 and notes 3 & 7	Redactions discussing confidential exhibits					

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Exhibits 43, 44 & 46	Sealing of emails and attachments discussing confidential information	In addition, Exhibits 43-44 were produced by non-party TrialCard pursuant to a subpoena and designated as Confidential – Attorneys' Eyes Only.	information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	available or practicable.		